

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Court Judge

Honorable Thomas J. Vanaskie,
Special Master

DECLARATION OF GREGORY D. HERROLD, ESQ.

I, Gregory D. Herrold, Esq. state:

1. I am an attorney at law of the State of New Jersey, a member of good standing of the bar of this Court, an Associate with the law firm of Duane Morris LLP, and counsel to Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Solco Healthcare U.S. (“Solco”), and Huahai U.S. Inc. (“Huahai U.S.”), and collectively with ZHP, Princeton, and Solco, “the ZHP Parties”).

2. I make this Declaration based on personal knowledge and in support of the ZHP Parties’ Opposition to Plaintiffs’ Motion to Compel.

3. A true and correct copy of excerpts from the final transcript of Lihong (Linda) Lin's deposition testimony on May 4, 2021 is attached to this Declaration as **Exhibit A.**

4. A true and correct copy of excerpts from the final transcript of Jun Du's deposition testimony on May 27, 2021 is attached to this Declaration as **Exhibit B.**

5. A true and correct copy of excerpts from the final transcript of Min Li's deposition testimony on April 20 and 22, 2021 is attached to this Declaration as **Exhibit C.**

6. A true and correct copy of excerpts from the final transcript of Eric Gu's deposition testimony on April 5, 2021 is attached to this Declaration as **Exhibit D.**

7. A true and correct copy of excerpts from the final transcript of Hai Wang's deposition testimony on March 10, 2021 is attached to this Declaration as **Exhibit E.**

8. A true and correct copy of a receipt dated June 5, 2018 reflecting a payment made by ZHP to a third party, Hangzhou Guanxiang Technology Co. Ltd, (ZHP02730425) is attached to this Declaration as **Exhibit F.**

9. A true and correct copy of an English translation of a receipt dated June 5, 2018 reflecting a payment made by ZHP to a third party, Hangzhou Guanxiang Technology Co. Ltd, (ZHP02730425) is attached to this Declaration as **Exhibit G.**

10. A true and correct copy of an email chain dated May 21, 2018 (ZHP02730426) is attached to this Declaration as **Exhibit H**.

11. A true and correct copy of an English translation of an email chain dated May 21, 2018 (ZHP02730426) is attached to this Declaration as **Exhibit I**.

12. A true and correct copy of an ZHP internal application for payment form for Hangzhou Guanxiang Technology Co. Ltd. related to fees for technical services, dated June 6, 2018 (ZHP02730423) is attached to this Declaration as **Exhibit J**.

13. A true and correct copy of an English Translation of an ZHP internal application for payment form for Hangzhou Guanxiang Technology Co. Ltd. related to fees for technical services, dated June 6, 2018 (ZHP02730423) is attached to this Declaration as **Exhibit K**.

14. Attached to this Declaration as **Exhibit L** is a copy of metadata produced with ZHP00190573.

15. A true and correct copy of excerpts from the May 12, 2021 Case Management Conference in this matter is attached to this Declaration as **Exhibit M**.

16. A true and correct copy of excerpts from the June 25, 2021 Case Management Conference in this matter is attached to this Declaration as **Exhibit N**.

17. A true and correct copy of excerpts from the final transcript of Jie Wang's deposition testimony on May 18, 2021 is attached to this Declaration as **Exhibit O**.

18. A true and correct copy of a September 2020 email chain between counsel for Plaintiffs and the ZHP Parties discussing production of API batch records and the nitrosamine testing records is attached to this Declaration as **Exhibit P**.

19. A true and correct copy of an August 28, 2020 email and production index is attached to this Declaration as **Exhibit Q**.

I declare under penalty of perjury that the foregoing Declaration is true and correct.

Dated: August 13, 2021

DUANE MORRIS LLP

/s/ Gregory D. Herrold
Gregory D. Herrold